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April 20, 2000

Dear Director of Food Distribution:

I would like to address the USDA Proposal for Change as it applies to Food Distribution 2000.

As a former School Nutrition Manager and now a SN Training Manager, I send this letter with a ground level perspective. I have dealt with USDA commodity foods from the time they are taken off the delivery truck at our back door until they are served to our students.

SECTION II

Proposal #4: Allowing vendors to use commercial labels.

- (a) School Nutrition personnel responsible for checking deliveries would be taken away from his/her duties in the kitchen for longer periods of time matching codes. The same person may not be available to check in deliveries every time, therefore the new person may not be aware of the correct process with the codes.
- (b) An example of another problem would be in the middle of lunch service when the line needs more of a food product. The person responsible for food prep has five minutes or less to go to the stockroom, get the cans of food, open the cans, pour the food into pans and get the pans into the steamer. Do you think this person is going to take time to bother checking codes to see if the food product is USDA or purchased? I personally do not see it.
- (c) It would be a virtual nightmare for SN Managers on inventory day. If, after, the manager takes inventory, it doesn't match her perpetual inventory, the manager is going to have to spend time she has allotted for something else, tracking the products. SN Managers do not have enough time in the day, as it is, to get the required paperwork finished, much less having extra put upon them.

Proposal #6: Expand full substitutability of commodity product.

- (a) I feel as though industries with USDA contracts should be required to use products USDA provides instead of products that could be inferior and potentially threatening to our younger students.
Please remember these little people who do not have fully developed immune systems.

Proposal #7: Work with states to test the seamless commodity distribution concept.

I have the same opinions about this proposal as I do #4.

Proposal #8: Facilitate the processing of commodities with limited demand.

This is a wonderful idea. It is difficult to use twenty cases of raisins or ten cases of date pieces or fig nuggets, etc. creatively. Thank you for this possible change.

Proposal #14: Work with States and partners to pilot-test improvements.

With only a few weeks left in this school year, it would be nearly impossible to formulate, test and form opinions in the short time allotted.

Proposal #15: Streamline paperwork and reporting requirements.

I hope this will be at the school level as well as the central office and state department level. Not only would less paperwork alleviate extra time spent out of the kitchen for managers, but it would also give directors more time to physically spend within the schools.

Please take into consideration the opinions I have expressed not only for myself, but also for thousands of School Nutrition Managers and Assistants.

In closing, I would like to thank you for providing us with the USDA Commodities program.

Sincerely,



Debra Williams
School Nutrition Training Manager
Gordon County Schools